

Approved by:		
	General Manager	Radiation Safety Officer

## STANDARD OPERATING PROCEDURE

### 15.RPP.03

## WORKER RADIATION PROTECTION RECORDS

### 1.0 OBJECTIVE

To define general and specific worker radiation protection records that shall be generated and maintained for Clean Harbors Deer Trail (CHDT) employees who may be exposed to radiation and radioactivity from site activities.

### 2.0 SCOPE

This standard operating procedure (SOP) applies to all worker radiation protection records generated for workers at the CHDT facility. These records include, but are not limited to, the following:

- Radiation Protection Policy Statements
- Sign-in sheets for training sessions
- On-the-job training records
- Annual dosimetry records and dose calculations
- Historical individual dose records
- Routine contamination survey forms
- Personnel decontamination forms
- Air monitoring data
- Waste confirmation sampling analytical data
- Instrument calibration certificates
- Memoranda to file regarding worker exposure
- Radiation work permits (RWP) with briefing sign-in sheets
- Signed vehicle exclusive use forms
- Current and historical SOPs
- SOP approval and employee acknowledgement sign-off forms
- Records of disposed radioactive materials

### **3.0 POLICY**

All records pertaining to CHDT worker activities associated with the receipt, treatment, and disposal of regulated waste shall be maintained in their personnel files. All records of exposure, internal and external, are legal and personal and shall be controlled to preclude release of personnel information to non-authorized personnel. All radiation protection records including individual worker records, approved procedures, amendments, revisions and renewals shall be maintained consistent with the Colorado Regulations 6 CCR 1007-1, § 4.40, 4.41, 4.42, 4.44, 4.47, and 4.50. Individual forms are subject to change as needed. Records retention requirements will remain unchanged.

### **4.0 RESPONSIBILITIES**

Responsibilities of the CHDT RSO, CHDT management, and other Clean Harbors staff are defined in the Radiation Protection Plan (SOP 15.RPP.01).

### **5.0 WORKER RADIATION PROTECTION RECORDS PROCEDURE**

#### **5.1 Requirements**

Record keeping requirements are defined in the RPP, including identified retention periods. The CHDT RSO shall maintain the following records in a clear, concise, and orderly format. Retention periods are included in parentheses.

- Radiation surveys, as required (3 years)
  - Radiation field surveys for areas in proximity to radioactive materials for disposal
  - Ambient radiation field surveys in unaffected areas, and
  - Contamination surveys for release of trucks and equipment
- Survey instrument calibrations, as required by the manufacturer (3 years)
- Personnel records (1 year post-termination of employment)
  - Worker/user lists
  - Training records (as described in 5.2 below)
- Individual monitoring results, for routine exposures, planned special exposures, accidents, and emergency conditions using appropriate occupational exposure record forms (duration of license)
- Records of waste disposal (per RCRA Permit requirements)
- Annual ALARA program audits (duration of license)
- Incident investigation reports (duration of license)
- Declarations of pregnancy (duration of license)
- Environmental monitoring data and reports (duration of license)
- Operating and emergency procedures (current)
- Procedure manuals from CHDT RSO (current)

## 5.2 Training

The CHDT RSO shall ensure that all staff radiation protection training records are dispositioned, controlled, and maintained as described in this procedure:

- Upon completion of the training roster form, it shall be checked for completeness, accuracy, and legibility before disposition:
  - Ensure the form has been signed and dated,
  - Ensure that changes to the document are legible, with a simple line through deletions, and clearly printed inserts. All deletions and insertions shall include the initials of the individual making the changes.
- Training forms shall be filed as part of the CHDT Administrative filing system and shall include:
  - Course title, name of instructor, and date(s) of training,
  - Course completion rosters,
  - Course syllabus will be referenced,
  - Test scores for each class member, and
  - Documentation of any waivers, exceptions, or extensions.

## 5.3 Individual and Area Dosimetry Results

The Deer Trail RSO shall ensure that all individual worker and area dosimetry results obtained using SOP 15.RPP.04, *Individual and Area Dosimetry*, are recorded and filed in the Deer Trail Administrative filing system:

- Individual dosimetry results shall be filed in each worker's personnel file
- Area dosimetry results shall be filed in a separate administrative file so that trending analyses over time can be performed.

## 5.4 Individual Radiation Doses

The Deer Trail RSO shall ensure that all individual worker quarterly and annual radiation doses obtained using the SOP 15.RPP.04, *Individual and Area Dosimetry*, and SOP 15.RPP.05, *Estimating Inhalation Doses*, are recorded on the appropriate forms and filed in the CHDT Administrative filing system. Individual radiation dose results shall be filed in each worker's personnel file.

## 6.0 REFERENCES

None.